



DANIEL HARGRAVES
Partner

Freeborn & Peters LLP
Attorneys at Law
The Helmsley Building
230 Park Avenue, Suite 630
New York, NY 10169

(212) 218-8766 direct
(212) 218-8761 fax

dhargraves@freeborn.com

www.freeborn.com

January 14, 2019

VIA ECF AND FEDERAL EXPRESS

The Honorable Paul G. Gardephe
United States District Judge for the Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

**Re: Wesco Insurance Company and Technology Insurance Company, Inc.
v. Personnel Staffing Group, LLC; Civil Action No.: 18-civ-03771 (PGG)
Joint Status Letter Regarding Settlement and Case Management Plan**

Dear Judge Gardephe:

In accordance with the Court's November 27, 2018 Order, the parties submit this joint status letter.

This action was brought by Wesco Insurance Company and Technology Insurance Company, Inc. (collectively, the "Plaintiffs") asserting claims for breach of contract by Personnel Staffing Group, LLC ("PSG") for its alleged failure to permit an audit and to pay final premium due on two workers' compensation and employers' liability insurance policies.

Following the parties' November 26, 2018 joint letter to the Court, Plaintiffs have completed an audit based on the information provided by PSG. On January 11, 2019, the Plaintiffs provided PSG with an audit summary report. PSG is currently evaluating the report and the parties are in settlement discussions.

In order to allow for completion of PSG's review of the audit summary report and the parties' settlement discussions, counsel for the parties jointly request that the Court extend the stay of this action for six weeks to February 25, 2019.

We thank the Court for its consideration, and we are available at the Court's convenience to address any questions or concerns.



The Honorable Paul G. Gardephe
January 14, 2019
Page 2

A handwritten signature in blue ink, appearing to read "Dan Hargraves", written over a horizontal line.

Daniel Hargraves
Andrew J. Costigan
FREEBORN & PETERS LLP
The Helmsley Building
230 Park Avenue, Suite 630
New York, New York 10169
212-218-8760
dhargraves@freeborn.com
acostigan@freeborn.com

A handwritten signature in blue ink, appearing to read "Paul D. Sarkozi", written over a horizontal line.

Paul D. Sarkozi
Alexandra Kamenetsky Shea
TANNENBAUM HELPERN SYRACUSE &
HIRSCHTRITT LLP
900 Third Avenue
New York, New York 10022
212-508-6700
sarkozi@thsh.com
shea@thsh.com

*Counsel for Plaintiffs Wesco Insurance
Company and Technology Insurance
Company, Inc.*

*Counsel for Defendant Personnel Staffing
Group, LLC*

cc: Nathan A. Shev, Esq. (Sperling & Slater, P.C.)